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1401 H Street, N.W.
Suite 1020
Washington, D.C. 20005
Office 202/326-3810

Ameritech

Cronan Q. O'Connell
Director - Federal Relations

June 3, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

RE: Ex Parte Statement
Docket No. 93-162
Expanded Interconnection

Dear Mr. Caton:

This letter and its attachments summarize a conversation between Jay Blomquist, Manager-IIS Regulatory, Chuck Gibson, Manager-Network Services and me with Amy Glatter of the Tariff Division and Mary DeLuca of the Domestic Facilities Division on June 1, 1994. The Ex Parte conversation clarified trouble testing and repeater requirements in the provisioning of interconnection service.

Sincerely,

Cronan O'Connell

Attachments
cc: A. Glatter
M. DeLuca

EX PARTE CONVERSATION
INTERCONNECTION TROUBLE TESTING AND REPEATER REQUIREMENTS

TROUBLE TESTING

SCENARIO A: AMERITECH SUPPLIES THE POINT OF TERMINATION (POT) BAY, LOCATED OUTSIDE THE INTERCONNECTOR'S SPACE. SEE MODIFIED FIGURE 1:

- Ameritech receives the trouble call from interconnector

- Ameritech technician will test from the POT Bay[1] (DSX #2) to the DSX (DSX #3) to determine whether the trouble is in our network or interconnector's network.

- If trouble is not in Ameritech network, interconnector is called and offered cooperative testing -- between their remote location and the central office where they are collocated. Testing may be performed from Ameritech's location (DSX #3) to an interconnector's location outside of their transmission node. If trouble is detected in their equipment, they must dispatch to their transmission node to further isolate the trouble.

- Test signals cannot be sent from the POT Bay (DSX #2) to the interconnector. This is due to the way the POT Bay (DSX #2) is wired. Testing toward the interconnector is performed from Ameritech's DSX bay (DSX #3) in cooperation with the interconnector. Testing from the interconnector is performed to Ameritech's POT Bay (DSX #2).

SCENARIO B: INTERCONNECTOR SUPPLIES THE POT (POINT OF TERMINATION) BAY LOCATED IN INTERCONNECTOR'S SPACE. SEE MODIFIED FIGURE 2:

- Ameritech receives the trouble call from interconnector

- All testing is provided cooperatively with the interconnector. The interconnector may provide a test signal from a location outside of the transmission node. If trouble is isolated coming into Ameritech from their transmission node, the interconnector must dispatch to their transmission node in order to provide test signals from their POT bay toward our DSX (DSX #1).

REPEATER REQUIREMENTS
SEE MODIFIED FIGURE 1 AND 2:

- A repeater is required if the distance between any two DSX bays or other network elements exceeds a defined footage, specifically if DS3 DSX bays exceed 27 feet and DS1 DSX bays exceed 85 feet. In Figure 1, the distance is measured between DSX #1 and DSX #4. The

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1.Note: Ameritech uses a DSX for the POT Bay in all instances.

repeater can regenerate a signal up to 450 feet for a DS3 DSX and 655 feet for a DS1 DSX.

In Figure 2, the distance is measured between DSX #1 and DSX #2. The repeater can regenerate a signal up to 450 feet for a DS3 DSX and 655 feet for a DS1 DSX. Additionally, a repeater may be required if the distance between the FOTS and the DSX (DSX #1) exceeds a defined footage, specifically 450 feet for a DS3 DSX and 655 feet for a DS1 DSX. The signal generated from the FOTS is at maximum level just as if it originated from a repeater.

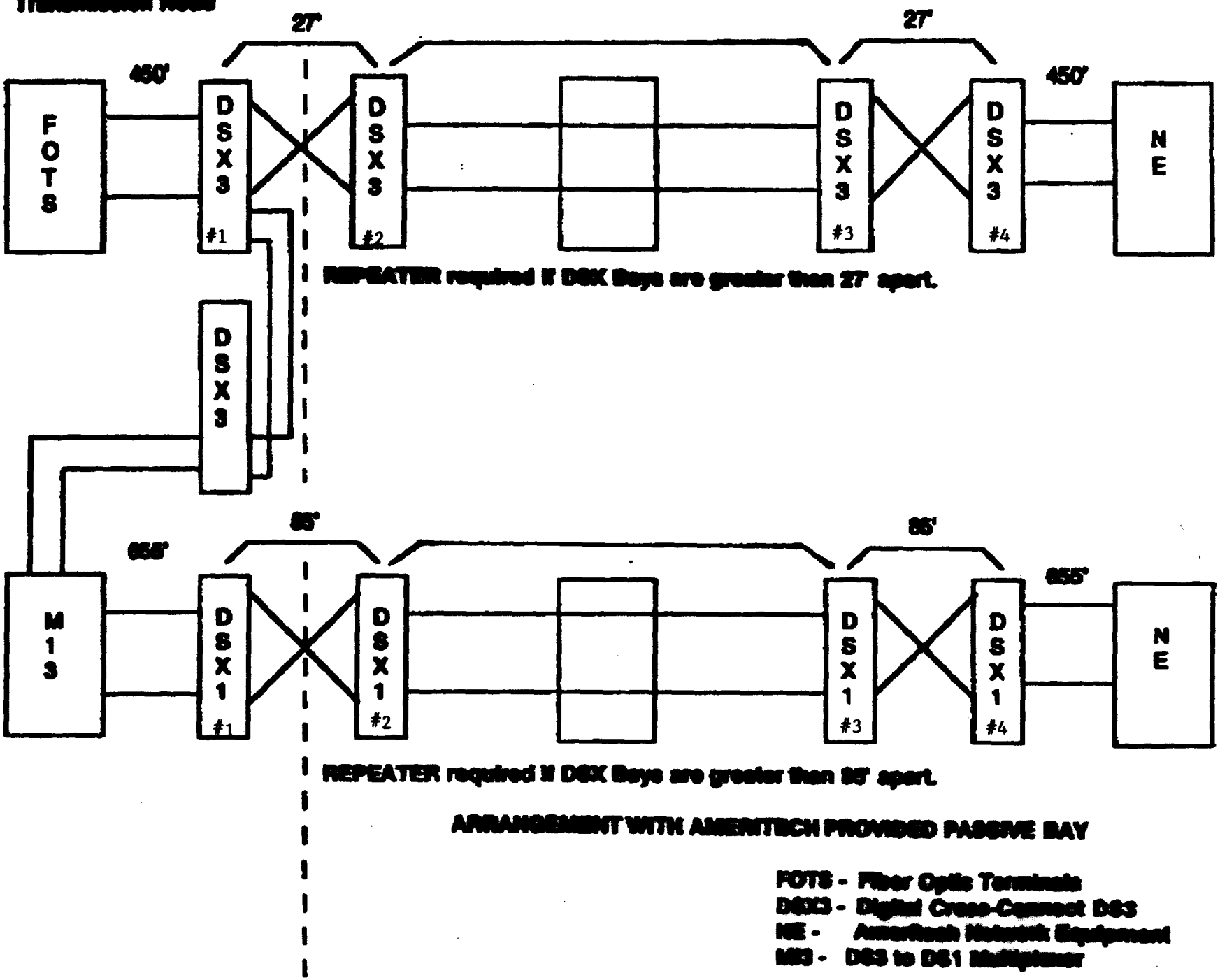
POINT OF CLARIFICATION
PASSIVE BAY VS. POT BAY

- In the course of the conversation, clarification was requested as to the difference between a "POT Bay" and a "Passive Bay" as referred to in Ameritech's tariff and supporting documentation. A POT bay may be active or passive. An active bay provides equalization and test access, while a passive bay is essentially a termination panel with test access but no equalization capability. Because of this, a passive bay is not considered an equal-level signal point. When an interconnector provides the POT bay, it is generally a true passive bay. When Ameritech provides the POT bay, a DSX is used. The DSX provides equalization and test access, and is therefore an equal-level signal point.

  Ameritech's tariff erroneously refers to its POT Bay as a Passive Bay. A clarifying text change can be made in a future filing.

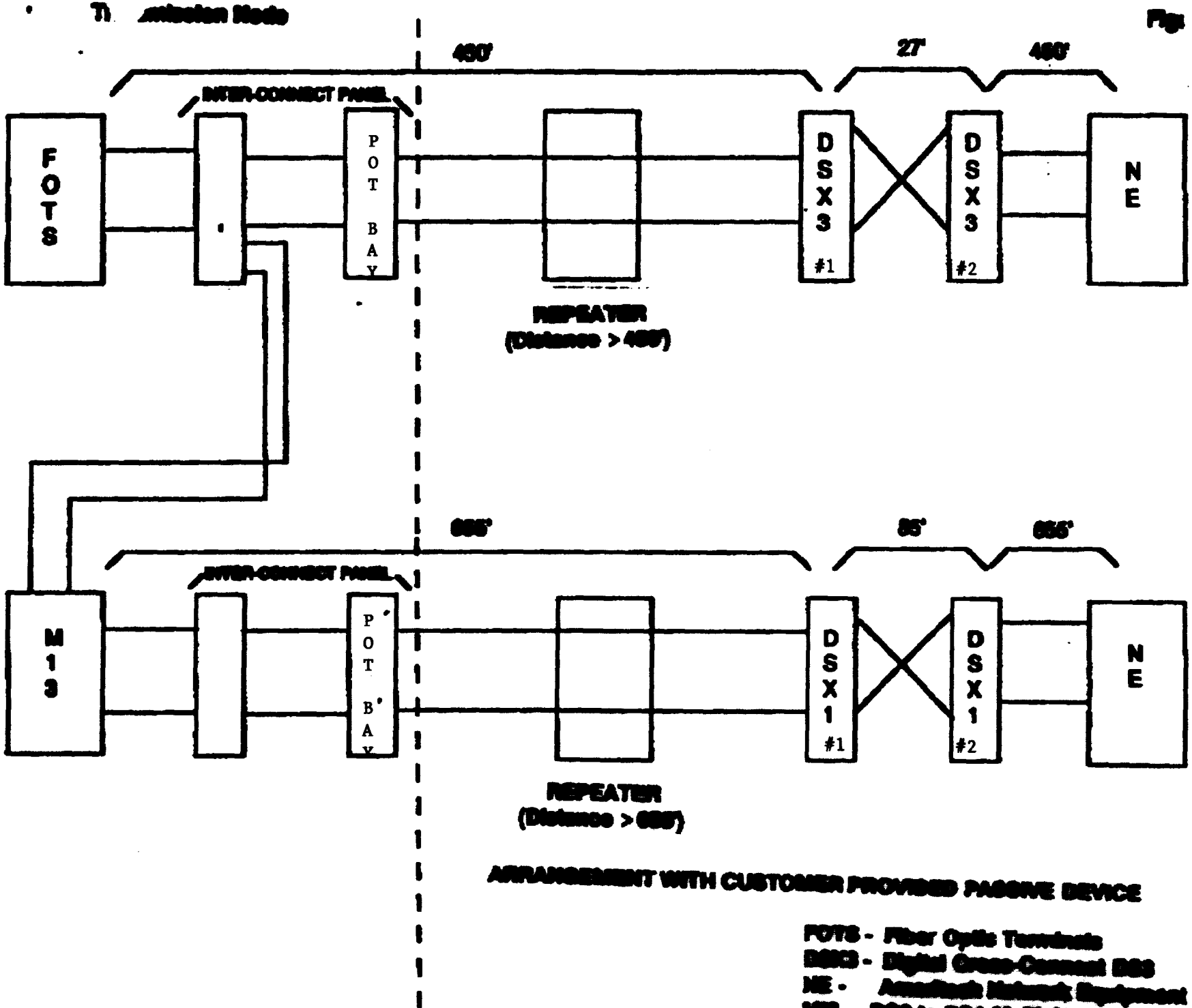
Figure 1

Transmission Node



ARRANGEMENT WITH AMERITECH PROVIDED PASSIVE BAY

FOTS - Fiber Optic Terminals
DSX3 - Digital Cross-Connect DS3
NE - Ameritech Network Equipment
M13 - DS3 to DS1 Multiplexer



ARRANGEMENT WITH CUSTOMER PROVIDED PASSIVE DEVICE

FOTS - Fiber Optic Terminals
DSX3 - Digital Cross-Connect DS3
NE - ...Network Element
M13 - DS3 to DS1 Multiplexer